

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC#:
DATE FILED: 5/3/21

Partner
Phone: 212.592.1410
Fax: 212.545.3331
lkaye@herrick.com

Lawrence M. Kaye

May 3, 2021

VIA ECF

The Honorable Alison J. Nathan United States District Court (S.D.N.Y.) Thurgood Marshall U.S. Courthouse 40 Foley Square New York, NY 10007

Re: Republic of Turkey v. Christie's, Inc., et al., 17 Civ. 3086 (AJN)

Your Honor:

We are counsel for Plaintiff, the Republic of Turkey, in this action. We have been working in good faith to comply with the current post-trial briefing schedule; however, the process is taking longer than anticipated. We therefore write to respectfully request a one-week extension for Plaintiff's opening brief, as well as an additional three-day extension for Plaintiff's reply. In addition, we would agree to extend the filing date of Defendants' opposition brief by one week. Our proposed dates for the extended post-trial briefing schedule are as follows:

| Filing: | Current Date: | Proposed Date: |
|------------------------------|----------------------|--|
| Plaintiff's Opening Brief | May 6, 2021 | May 13, 2021 |
| Defendants' Opposition Brief | May 27, 2021 | June 3, 2021 |
| Plaintiff's Reply | June 4, 2021 | June 14, 2021 (11 days after Defendants file the Opposition Brief) |

The parties have met and conferred with respect to this request. Counsel for Defendants do not agree to our proposed extension but would accept an extension with the dates set forth above if Defendants are allowed to submit a sur-reply on laches. We do not believe that a sur-reply is HERRICK, FEINSTEIN LLP • Two Park Avenue • New York, NY 10016 • Phone: 212.592.1400 • Fax: 212.592.1500



The Honorable Alison J. Nathan May 3, 2021 Page 2

appropriate or fair. Moreover, as the litigation has been ongoing for over four years, an additional week will neither adversely affect Defendants nor interfere with the Court's desire to expeditiously conclude this case. Plaintiff therefore requests this brief extension with the dates noted above.

We thank the Court for its consideration of this matter.

Respectfully submitted,

s/Lawrence M. Kaye

Lawrence M. Kaye
Counsel for Plaintiff Republic of Turkey

cc: All Counsel of Record (via ECF)

SO ORDERED.
ALISON J. NATHAN, U.S.D.J.

Plaintiff's request for an extension of the briefing schedule is granted in part. Plaintiff's opening brief is now due May 10, 2021.

Defendants' opposition brief is due May 31, 2021. Plaintiff's reply brief is due June 8, 2021.

Defendants' request for permission to file a sur-reply on laches is denied. SO ORDERED.